

From: "Michael P Geml" <mgeml@busey.com> on 02/16/2006 09:05:03 AM

Subject: Interagency Concentrations in Commercial Real Estate Lending

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Jennifer Johnson

Dear Jennifer Johnson:

The purpose of this communication is to comment on the Guidance being proposed with respect to commercial real estate lending. Commercial real estate lending is an intricate component of the economic well being of not only our market area of Lee County but also that of the State of Florida.

The need for sound lending and sound loan portfolios, is the foundation of many financial institutions and that should not be ignored in any way. I have concerns, however, that the Guidance as announced will have a negative overall effect on my institution and the economy as a whole.

My concerns are not so much with the individual practices set out in the Guidance, but rather with the manner by which the the Guidance is imposed.

I am concerned that the rules of the game have suddenly changed, and the impact of such a decision is not being adequately measured.

Specifically there are several points that need clarification. First, that in looking at concentrations there will not be a one size fits all response. Each of our institutions has a different history, different controls, different portfolios, and different markets. When those in the field determine there is a concentration any response needs to be tailored for the specific circumstances.

Second, we hope the Guidance will make it very clear that if the concentration thresholds are exceeded it does not automatically require a capital increase. Any increase should be in the context of the circumstances of the particular institution.

Third, the Guidance should expressly indicate that its purpose is not to discourage commercial real estate lending.

If the Guidance is imposed in a mechanical or arbitrary manner or if it is intended to effect a policy shift discouraging commercial real estate lending then I fear grave consequences. Secured real estate lending has been the bread and butter of banks in Florida. If such loans are not available then we will have to look to other types of credits which historically have been more risky?

Perhaps most important, if the message is perceived to be that commercial real estate lending has great regulatory risk, then such loans will significantly diminish. This will lead to a downturn in our economy that will create systemic problems for banks far beyond the risk of commercial

real estate loans.

I thank you for your consideration of these concerns and comments and hope that the final Guidance will address them in a meaningful way

Sincerely,

Michael P. Geml